

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

GPAT PATTERSON,)	Case No. 5:22-cv-02052
Plaintiff,)	
)	Judge: Hon. John R. Adams
v.)	
)	<u>PLAINTIFF’S MOTION TO AMEND</u>
KENT STATE UNIVERSITY, <i>et al.</i>,)	<u>CASE MANAGEMENT PLAN</u>
Defendants.)	

COME NOW, Plaintiff, GPat Patterson, Ph.D., by and through counsel, and moves the Court to enter an Order under Civil Rule 16(b)(4), amending the Case Management Plan [Doc. #20], to include the following expert disclosure deadlines:

- Deadline for Plaintiff to submit expert report(s): October 30, 2023;
- Deadline for Defendants to submit expert report(s): December 15, 2023;
- and
- Deadline to complete expert depositions: February 1, 2024.

Defendants’ counsel has indicated that Defendants don’t oppose the above-identified proposed amendments to the Case Management Plan.

The relief requested in the instant Motion is well within the Court’s discretion under Rule 16. If the Court grants the same, such will facilitate the ends of justice by allowing the parties to resolve their disputes on the merits, limit the risk of discovery disputes, promote judicial economy, and preserve the resources of the parties. No party will be prejudiced if the Court grants Plaintiff’s Motion. Nor do the parties anticipate that any existing deadlines will be impacted if the Court amends the Case Management Plan as requested. This Motion isn’t being tendered for purposes of delay or any other dilatory motive. A proposed Order is contemporaneously tendered.

Dated: September 26, 2023.

Respectfully submitted,

/s/Justin Whittaker
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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of September 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Justin Whittaker
Justin Whittaker, Esq. (0093212)